



Department of Employment & Temporary Assistance  
Julie Hornback, Director

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May 18, 2009

MAY 27 2009

Ramon S. Lopez, Chief  
Civil Rights Bureau  
Human Rights and Community Services Division  
Department of Social Services  
744 P Street  
Sacramento, CA 93814

Dear Mr. Lopez,

The Fresno County Department of Employment and Temporary Assistance is pleased to provide you with our Corrective Action Plan in response to the Civil Rights Compliance Review conducted March 16-19, 2009. We respectfully ask that you include our Corrective Action Plan with any public requests for your report.

Please notice that our Facilities Division is currently in negotiations with the owners of the Fresno Fairgrounds parking lot. It is my sincere desire to have these negotiations completed as soon as possible in order to better serve our clients.

If you have any questions or concerns in regards to this Corrective Action Plan, please contact Reneeta Anthony, Civil Rights Coordinator, at (559) 453-3858 or Nicole Argain, Civil Rights Investigator, at (559) 454-2996. We look forward to our continued collaboration in the area of improving services to Fresno County residents.

Sincerely,

Julie Hornback, Director

Attachment

**CIVIL RIGHTS CORRECTIVE ACTION PLAN  
FOR  
FRESNO COUNTY  
EMPLOYMENT & TEMPORARY ASSISTANCE DEPARTMENT**

**Civil Rights Compliance Review March 16-19, 2009**

## **CIVIL RIGHTS CORRECTIVE ACTION PLAN**

### **I. INTRODUCTION**

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Fresno County Department of Employment & Temporary Assistance with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

Interviews with selected public contact staff were held in advance of an on-site review, which was conducted on March 16 – 19, 2009. An exit interview was held with administrative staff on March 19, 2009.

The review was conducted in the following locations:

<b>Facility</b>	<b>Address</b>	<b>Programs Reviewed</b>	<b>Languages spoken by a substantial number of clients</b>
Barton Building	4499 Kings Canyon Rd.	Fair Hearings	Varies by Hearing Agenda
Commissary	4449 E. Kings Canyon Rd.	CalWORKs & NAFS; New American Cash Assistance (Case review only from Main)	English, Hmong, Spanish, Lao, Cambodian
Fairgrounds	4468 E. Kings Canyon Rd.	CalWORKs; NAFS	English & Spanish
Airport	4944 E. Clinton	WTW	English & Spanish

- At the Commissary facility, however, the case file sample represented a diverse population of 11 different languages, not all of which are threshold languages (5% of clients).

### **II. SUMMARY OF METHODOLOGY**

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2008-2009 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Below is a summary of the sources of information used for the report:

### **Interviews Conducted with Public Contact Staff**

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	8	(7)
Job Specialists	3	(2)
Lobby Receptionists	2	(2)
Appeals Specialist	1	(0)
<b>Total</b>	<b>14</b>	<b>(11)</b>

### **Reviewed Case Files (Total 98 cases)**

English speakers' case files reviewed	7
Non-English or limited-English speakers' case files reviewed	91
Undocumented/Unable to determine	0
Languages of non-English cases	Spanish, Hmong, Cambodian, , Laotian, Russian, Punjabi, Vietnamese, Cantonese, Armenian, Somalian

### **Program Manager Surveys**

Number of surveys distributed	4
Number of surveys received	4

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. Any required corrective actions are stated at the end of each section.

Section X of the report is reserved for a discussion of overall compliance.

### III. DISSEMINATION OF INFORMATION

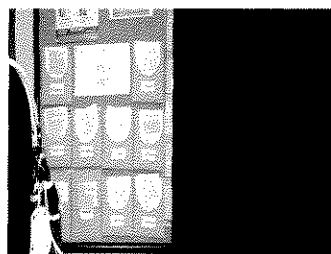
Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

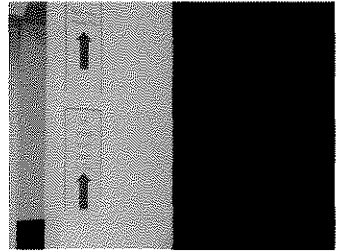
#### A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Clients are generally able to access services during the normal hours due to the early 7:30 a.m. opening of most offices. Special arrangements with the workers can also be made, as well as one Saturday per month for working clients who participate in WTW.
Does the county have extended hours to accommodate clients?	X			According to the Managers' surveys, accommodations are made on a case by case basis for those not able to meet the 7:30-3:30 period of worker availability.

<b>Access to Services, Information and Outreach</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Can applicants access services when they cannot go to the office?	X			Alternatives include access via the telephone, mail and home visits.
Does the county ensure the awareness of available services for individuals in remote areas?	X			An Outreach Unit and Regional Centers in Reedley, Selma and Coalinga provide this service, as well as agency participation with local media, speaker's bureau and partnerships with the Enterprise Zone.

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs"?	X			The pamphlets are distributed and discussed at intake and annual review and are also on display in lobby/reception areas.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			Workers review the pamphlet with the clients at intake and annual renewal.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Armenian and Cambodian?	X			The lobby areas in the Commissary and Fairgrounds facilities had excellent displays of the available pamphlets.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Was the Pub 13 available in large print, audiocassette and Braille?	X			In addition to the traditional versions of the alternate formats of the Pub 13, E&TA workers reported that an audio link on their Intranet was available and would provide this audio version for the visually impaired.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			<p>Translated instructional and informational material was excellent in the locations reviewed. There were displays of the "I speak" cards in all the major threshold languages, informing clients of the availability of language services.</p> 

Signage, posters, pamphlets	Yes	No	Sometimes	Comments
				<p>In the Commissary Building, however, the signage directing clients to the second floor for the New Americans Unit was only in English and Spanish (none of the Asian languages of clients served by this program). Staff acted immediately to initiate the process to secure appropriate translations for posting.</p> 

### B. Corrective Action

Informational Element	Corrective Action Required
Directional and Instructional Signage	<p>(Commissary Bldg.) Fresno E&amp;TA must post directional signage for the New Americans Unit in the Asian threshold languages spoken by clients participating in that program. Div. 21, 107-212</p>

### COUNTY'S RESPONSE

**Directional signage has been added in the Asian threshold languages spoken by clients.**

#### IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the ADAAG in the Corrective Action column refers to the federal Standards for Design, and the Title 24 of California Code and Regulations (T24 CCR) are also cited because there are instances when California state law is more stringent than ADAAG specifications.


The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

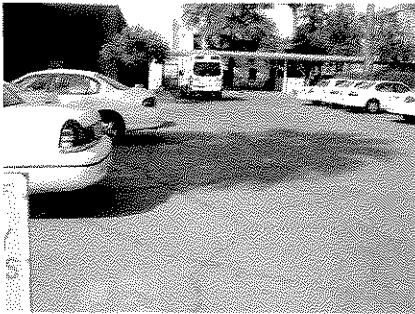
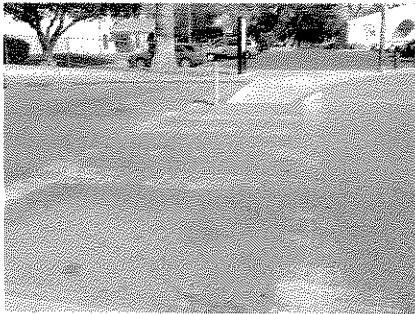
##### A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR), and Americans with Disabilities Act Accessibility Guidelines (ADAAG).

**Facility Location # 1:** Commissary Building, 4449 E. Kings Canyon Rd.

Facility Element	Findings	Corrective Action
Parking	1. There was no warning sign regarding "unauthorized parking" in the designated accessible parking spaces.	1. Additional signage shall be posted in a conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Signage shall be 17" by 22" minimum in size with lettering 1" minimum high, stating:

Facility Element	Findings	Corrective Action
	<p>2. Pavement markings depicting spaces for disabled parking were severely faded and could not be considered clearly visible.</p> <p>3. The freestanding sign height measured only 52 inches from the ground.</p> 	<p>“Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner’s expense. (CA T24 1129B.5).</p> <p>2. Pavement signage shall be 36” x 36” minimum, white on blue in color, visible and centered. (CA T24 1129B.5.1 &amp; 2).</p> <p>3. Sign height shall be 80” minimum from the bottom of the sign to top of finish grade. ((CA T24 1129B.5, ADA 4.6.5)</p>
Route to Main Door	<p>There is no signage directing individuals to the intended safe path of travel along a sidewalk leading to the main entrance. Once crossing the street from the designated parking spaces, a person faces a parking area for county emergency vehicles. There is constant traffic and rough pavement in this area – yet it is right in front of the</p>	<p>Directional signage and pavement marking is needed to provide compliant accessibility to the main entrance to the commissary building. Access aisles (load and unload) much connect to the accessible path of travel, including curb cuts or ramps as needed. (CA T24 1133B.7.1).</p>

Facility Element	Findings	Corrective Action
	<p>main entrance to the commissary building. Cross walks with very faded paint do exist, but are in need of repainting and signage is needed to direct clients to the sidewalk provided. (Pictures provided below of both the county emergency vehicle area and the intended path of travel).</p>  	
Building Entrance	The pressure required to open both sides of the entrance door measured approximately 10 lbs.	Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]
Restrooms	Both the men's and the women's restroom doors required excess pressure to open. The range measured from 14 to 18 lbs.	Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]

## COUNTY'S RESPONSE

Facility Element	Response
Parking	<ol style="list-style-type: none"> <li>1. Work request was submitted 5/4/09. The County's General Services Department indicated these signs would be installed by 5/30/09.</li> <li>2. A work order was submitted on 5/5/09 for all parking lot painting.</li> <li>3. The signage was raised to 80" on 5/5/09.</li> </ol>
Route to Main Door	Directional signage was ordered and a work order was submitted on 5/5/09 for all parking lot painting.
Building Entrance	A request was made on 5/5/09 to adjust the door pressure to 5 pounds.
Restrooms	A request was made on 5/5/09 to adjust the door pressure to 5 pounds.

### **Facility Location # 2: Fairgrounds Facility, 4468 E. Kings Canyon Rd.**

Facility element	Findings	Corrective Action
Parking	<ol style="list-style-type: none"> <li>1. There were 10 spaces in a row designated for disabled parking, however only 1 space at the north end had the necessary access aisle.</li> <li>2. Of the 10 spaces designated for disabled, only 5 had freestanding signs.</li> </ol>	<ol style="list-style-type: none"> <li>1. Accessible space minimum requirements are: 9' wide, 18' long and 5' access aisle.  Access aisle shall be 18' x 5' minimum for cars and 18' x 8' for vans. (CA T24 1129B.4.1&amp;2, ADA 4.6.3)</li> <li>2. Freestanding signs shall be 80" from top of grade or wall mounted signs at 36". (CA T24 1129B.5, ADA 4.6.5)</li> </ol>

Facility element	Findings	Corrective Action
	(Pictures lost)	
Restrooms	<ol style="list-style-type: none"> <li>1. The pressure of both the men's and women's restroom doors was slightly too high @ approx. 7 pounds.</li> <li>2. The soap dispenser in the men's restroom was too high (measured @ 57")</li> </ol>	<ol style="list-style-type: none"> <li>1. Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) &amp; (b)]</li> <li>2. The operable part of dispensing fixtures in accessible restrooms are to be at a maximum height of 40" from the floor. (CA T24 1129B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6, ADA 4.6.5)</li> </ol>

**COUNTY'S RESPONSE:**

Facility Element	Response
Parking	<ol style="list-style-type: none"> <li>1. A meeting will be scheduled with the Fresno Fair staff to discuss addressing the accessible spaces, access aisles, and freestanding signs.</li> </ol>
Restrooms	<ol style="list-style-type: none"> <li>1. A request has been made to adjust the door pressure to 5 pounds.</li> <li>2. A new soap dispenser was installed at 40".</li> </ol>

**Facility Location # 3: Airport Facility, 4944 E. Clinton Ave.**

This facility is a small suite in a complex of offices and serves as a reception and assessment site for newly assigned Welfare to Work clients. Clients only appear one time at this location and their case is then transferred to other locations for ongoing case management. There is no lobby/reception area other than the few chairs in the office receptionist area.

The clients report in and attend an orientation before they are assessed by intake workers. The building is accessible, even though no disabled clients participate in the WTW requirement due to their exempt status according to workers. There is no accessible restroom, however, since all clients must use a shared restroom in another location. This restroom could not be considered accessible due to the need to use a key to unlock and twist the door knob to enter. Additionally, access to the restroom facility requires a path across rough, uneven bricks to access it.

Corrective Action: In the event that a disabled person voluntarily chooses to participate in the program, E&TA should have a policy/procedure in place that would provide for use of the accessible restroom facility within the WTW suite (staff restroom) or escort procedures to the public restroom.

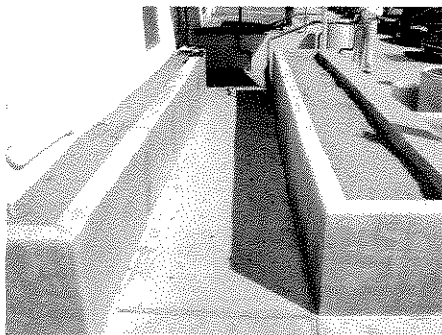
COUNTY'S RESPONSE:

Employment and Temporary Assistance is working to establish a procedure that will provide for use of the accessible restroom facility within the WTW suite for disabled participants.

**Facility Location # 4: Barton Building, 4449 E. Kings Canyon**

This facility is the administrative headquarters for Employment & Temporary Assistance. The reason it was included in the 2009 review is because it is the location for fair hearings conducted by the agency. The facility review for this site included those elements of client accessibility that would be necessary for conducting the hearings.

Facility element	Findings	Corrective Action
Parking	1. Ground markings were very faded and can not be considered visible.	1. Pavement signage within the vehicle space must be 36" X 36" minimum, white on blue in color, <i>visible</i> and centered. (CA T24 1129B.5.1&2)
Restrooms	There were no accessible restrooms available to clients in the Barton Building. There was a sign posted directing them to the Main Building for accessible restrooms. This sign, however, was posted	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3; CA

Facility element	Findings	Corrective Action
	<p>very high and did not have the international symbol of accessibility on it.</p> <p><u>Note:</u> the Main Building was not a site included in the 2009 review, however, in following the instructions to access restroom facilities at that location it was observed that no hand railing was provided along the ramp accessing the entrance to that building. (Photo provided below)</p> <p>Ramp at Main Bldg.</p> 	<p>T24 1117B.5.8.1.2)</p> <p>Handrails are required on both sides of ramps of 6' or greater. (CA T24 1133B.5.5, ADA 4.8.5)</p>

COUNTY'S RESPONSE:

Facility Element	Response
Parking	A work order was submitted on 5/5/09 for all parking lot painting.
Restrooms	New signage is now installed at the bottom of the window and

	<p>includes the international symbol of accessibility.</p> <p>The “ramp” that was installed on the South end of Building 311 is actually not a ramp at all, but a sloping walkway. Section 1133B.5.1 of the C.B.C. states that “Any accessible route of travel shall be considered a ramp if its slope is greater than one unit vertical in 20 units horizontal (5 percent slope)”. The sloping walk in question was designed to have a slope of about 1 in 23 feet, or a 4.3% slope, (see sheet A-1.2 of the Construction Documents). While installed conditions may have varied slightly from this, the installed slope should not exceed 1 in 20. Therefore, Section 1133B.5.5 that requires handrails does not apply.</p>
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### **Building Access and Hearing Room Accessibility**

The hearing room is located on the second floor, following check-in/registration on the first floor. There is no elevator in this building, which means clients (and staff) have to walk a rather cumbersome path up two ramps to the hearing location. It should be noted, however, that both ramps meet basic ADA standards for slope/incline, width, hand railings, etc. It becomes a practical matter of distance and fatigue for those individuals who may have difficulty either walking or wheeling a wheelchair to that second floor location. It was stated by both the Fair Hearings Manager and the Director that E&TA will make accommodations on a case by case basis for those individuals requesting such accommodations. Examples cited were telephone hearings, hearings in the home (subject to State Hearing Officer scheduling) or utilizing available first floor space temporarily. With accommodations available, and ADA requirements for ramps met, this review has no findings that require further corrective action. It is important, however, that disabled clients are made aware of the reasonable accommodations that are available to them upon request.

### **V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient). Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a

substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDDs), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action be in the individuals' primary language.

**A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews**

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Each facility is staffed with bilingual reception staff and staff utilizes the "I Speak" cards in identifying a language they may be unfamiliar with.
Does the county use a primary language form?	X			Form 2229, Primary Language Form, is in use to identify the client preferences for both spoken and written communication.
Does the client self-declare on this form?	X			Staff indicates that clients provide the information and either fill out the form themselves or provide the information to the worker.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			There is a wide diversity of bilingual staff who provide interpreter service to their own caseload and also assist co-workers. In addition, the language line and lists of available interpreters are used.
After it has been determined that the client is limited-English or non-English speaking, what is the county process for procuring an interpreter?	-	-	-	Whenever possible, clients are assigned to bilingual workers. In some cases, workers "swap" cases to accommodate this. As noted above, other workers or the language line can also be utilized. When the client

Question	Yes	No	Some-times	Comments
				prefers, they may provide their own interpreter, but are made aware that the agency will provide one for them.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			.
Are county interpreters determined to be competent?	X			Bilingual workers are certified by the agency.
Does the county have adequate interpreter services?	X			The widest diversity of client population was found in the Commissary Building where the New Americans Unit is located. The staffing in that facility is diverse as well and provides appropriate interpreter services. Other locations also provide interpreter services, but tend to serve primarily English and Spanish populations with lesser numbers of other non-English speaking clients. In each of the locations, interpreters are made available and utilized appropriately.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		Only on an emergency basis would minors be allowed to interpret and then, it would be for routine processing, not for full interviews.
Does the county allow the client to provide his or her own interpreter?	X			According to staff, it is preferred that the agency provides the interpreter. However, if the client prefers his/her own interpreter, it is allowed and a release form (Form 2229 A) is completed.

Question	Yes	No	Some-times	Comments
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Based on client preference noted on the Primary Language Form 2229, forms are provided either in English or the language of choice.
Is the information that is to be inserted into Notices of Action translated into the client's primary language?	X			Again, this is determined by the client preference on the Form 2229. And bilingual staff translate as necessary and insert information into the notices. There is also an attached notice that is distributed with batched notices informing clients to contact their worker if they do not understand the written communication being sent. This notice contains the instruction in several languages.
Does the county provide auxiliary aids and services, telecommunication devices for the deaf (TDDs) and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille	X			<p>ASL interpreters are available for the hearing impaired. Several staff, however, indicated passing notes would be a method of communication used with the hearing impaired client for shorter, routine business.</p> <p>Most managers and staff indicated that staff would be made available to assist the visually impaired client</p>

Question	Yes	No	Some-times	Comments
material, taped text, large print materials (besides the Publication 13)?				in filling out the forms and a few mentioned the use of copy machines or large font size to enlarge material for low vision clients who may be able to see but with difficulty.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			In the course of processing, staff assist those clients who cannot read or write by reading to them and helping with the completion of forms.
Does the county offer screening for learning disabilities?	X			This occurs in the Welfare to Work Program.
Is there an established process for offering screening?	X			The offer is made as part of the initial assessment process in the WTW Program and initial testing is completed.
Is the client identified as having a learning disability referred for evaluation?	X			Further testing and evaluation is provided when appropriate.

**B. Corrective Actions: None Required**

**VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

### A. Findings from Case File Reviews and Staff Interviews

<b>Documentation Item</b>	<b>Cal WORKs</b>	<b>Food Stamps (NAFS)</b>
Ethnic Origin	SAWS 1	DFA 285 A1 or SAWS 1
Primary language	Form 2229	Form 2229
Method of providing bilingual services	Worker narrative entry in the CalWin system	Worker narrative entry in the CalWin system
Client provided own interpreter	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample
Method to inform client of potential problem of ineffective communication using own interpreter	Form 2229-A	Form 2229-A
Release of information to Interpreter	Form 2229-A	Form 2229-A
Individual's acceptance or refusal of written material offered in primary language	Form 2229	Form 2229
Translated NOAs contain translated inserts	Bilingual staff provide translations as needed.	Bilingual staff provide translations as needed.
Documentation of minor used as interpreter	N/A	N/A
Method of identifying client's disability	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample
Method of documenting a client's request for auxiliary aids and services	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample

**Additional Comments:**

The reviewer noted an exceptional level of consistency and clarity in the case documentation of the language service needs and delivery of interpreter services in the cases reviewed. The Primary Language Form (Form 2229) was in every case and the narrative provided by the workers was some of the most thorough documentation of language services seen to date. Fresno Employment & Temporary Assistance Department staff and managers are commended for the effort that has been made to train staff and ensure ongoing casework includes this documentation.

**B. Corrective Action: None Required****VII. STAFF DEVELOPMENT AND TRAINING**

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

**A. Findings**

<b>Interview questions</b>	<b>Yes</b>	<b>No</b>	<b>Some-times</b>	<b>Comments</b>
Do employees receive continued Division 21 Training?	X			Staff receives civil rights training both as part of their new employee training and as ongoing mandated training. Electronic updates of policy, as well as quizzes, are a part of this ongoing training.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			Specific cultural awareness training is provided in addition to the basic civil rights policies and procedures.
Do the employees seem knowledgeable about the cultural groups receiving	X			Not only is there cultural awareness training, the workforce is diverse in the

services in their area?				various cultures served by the agency.
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**B. Corrective Action: None Required**

**VIII. DISCRIMINATION COMPLAINT PROCEDURES**

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. The Civil Rights Coordinator primarily uses this log once complaints get to him/her.

**A. Findings from Staff Interviews and Program Manager Surveys**

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			During interviews staff consistently were able to give examples of the various types of client complaints and articulate the process for resolution of each.
Did the employees know who the Civil Rights Coordinator is?	X			.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			They typically stated that there were "notices/posters" in the lobby.
When reviewing the	-	-	-	The complaint log has been

Interview and review areas	Yes	No	Some-times	Findings
complaint log with the Civil Rights Coordinator, was it complete and up to date?				forwarded to the assigned analyst in the Civil Rights Bureau for review.

**B. Corrective Action:** None Required

## **IX. CONCLUSION**

Fresno County Department of Employment and Temporary Assistance (E&TA) was found to be in compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws. As noted in the body of the report, minimal corrective action is required in response to findings in the 2009 review. There is clear evidence of a commitment to a civil rights program that involves all levels of an organization which values both staff and client diversity.

Director, Julie Hornback, attended the exit meeting and participated in the discussion of the review and its findings. Through that dialogue it was evident that within the parameters of fiscal realities and physical plant, policies and procedures will continue to be in place to respect the needs and/or limitations of all the clients served. Since the casework and documentation, as well as administrative practices related to work hours, postings, etc. were excellent, the primary area of discussion was on the physical plant and access to the services offered at the various locations.

Many of the buildings utilized by E&TA are old and have had to undergo major renovation to bring them into ADA compliance. Section IV of this report discusses specific findings at the sites included in the 2009 review. By way of conclusion, however, focus is centered on the Barton Building, where fair hearings are conducted. In that location, alternatives have been made available for reasonable accommodations on a case by case basis for the disabled. In this reviewer's opinion this reflects an overall philosophy of serving the client population and its individual needs. As long as the alternatives/accommodations are truly available and known to the clients and staff follow through on providing them, appropriate accessibility will be insured.

Fresno County Department of Employment & Temporary Assistance must remedy the violations identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the violations.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.